

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

JOHN MADIGAN,  
Plaintiff

v.

GENERAL STAR INDEMNITY CO.,  
Defendant

CIVIL ACTION NO. 04-cv-12665-DPW

**JOINT MOTION TO EXTEND TIME TO FILE OPPOSITION TO MOTION FOR  
SUMMARY JUDGMENT**

The parties to this action jointly move to extend the time within which the defendant must file an opposition and/or cross-motion to plaintiff's motion for summary judgment from June 6, 2005 to July 5, 2005. In support of their motion, the parties state the following:

1. The parties have commenced active settlement negotiations.
2. The outcome to these negotiations is dependant upon the pending decision of third-parties with a potential interest in this litigation.
3. This court has rescheduled the hearing on the motions for summary judgment from June 15, 2005 to July 13, 2005.
4. Neither of the parties will be prejudiced by this proposed extension of time.

For the foregoing reasons, the parties respectfully request that the time for the filing of an opposition and/or cross-motion to plaintiff's motion for summary judgment be extended to July 5, 2005.

Defendant, General Star Indemnity Company  
By its Attorneys,

/s/ Samuel M. Furgang \_\_\_\_\_  
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Plaintiff, John Madigan  
By his attorney

/s/ Michael C. Najjar  
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Dated: May 27, 2005

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